

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**INGE GOODSON,**

**Plaintiff,**

**v.**

**BANK OF AMERICA, N.A.,**

**Defendant.**

**Case No. 1:12-cv-00065**

**DEFENDANT’S MOTION TO DISMISS**

Defendant Bank of America, N.A. (“Defendant”), by its undersigned attorneys, respectfully moves the Court to dismiss the Complaint filed by Plaintiff Inge Goodson (“Plaintiff”) pursuant to Federal Rules of Civil Procedure Rule 12(b)(6) for failing to state a claim upon which relief may be granted. Plaintiff’s claim against Defendant fails as a matter of law and the Complaint should be dismissed in its entirety.

In support of its arguments, Defendant relies upon their concurrently filed memorandum of law.

Respectfully submitted,

/s/ Lauren Paxton Roberts

Lauren Paxton Roberts (B.P.R. No. 25049)

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CERTIFICATE OF SERVICE

I do hereby certify that true and exact copies of the foregoing **Defendant's Motion to Dismiss** has this day been filed with the Clerk of the Court using the CM/ECF system which sent notice of filing to parties listed and mailed a true copy of same via prepaid First Class mail and/or electronic mail to:

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Dated this 9<sup>th</sup> day of August, 2011.

s/ Lauren Paxton Roberts  
Lauren Paxton Roberts

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